

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

NATALIE ORRICO,

Plaintiff,

v.

NORDIC NATURALS, INC.,

Defendant.

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: Case No. 1:22-cv-03195
: (NRM)(CLP)

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**DECLARATION OF PHILIP FURIA IN SUPPORT OF PLAINTIFF'S
MOTION FOR A PROTECTIVE ORDER**

I. INTRODUCTION

I, Philip Furia, submit this Declaration in support of Plaintiff's Motion For A Protective Order, and affirm that the following is truthful and accurate:

1. I am an attorney duly admitted before this Court. I am partner at Sultz & Lipari, PLLC and am one of the attorneys principally responsible for handling this case for Plaintiff and the proposed Class.

2. I am personally familiar with the facts set forth in this Declaration. If called as a witness, I could and would competently testify to the matters stated in this Declaration.

3. Attached as Exhibit A is a true and accurate copy of Defendant's First Set of Interrogatories to Plaintiff.

4. Attached as Exhibit B is a true and accurate copy of Defendant's First Set of Document Requests to Plaintiff.

5. Attached as Exhibit C is a true and accurate copy of the Subpoena served by

Defendant on Amazon, Inc.

II. CONCLUSION

For the reasons set forth in this declaration, Class Counsel respectfully requests that the Court grant Plaintiff's Motion For A Protective Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 16th day of September, 2024 in Poughkeepsie, New York.

/s/ Philip Furia
Philip Furia